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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

A.M.J., a minor, by and through his
guardian ad litem, LINDA ESCOBEDO,
et al.; and J.R.J, a minor, by and through
his *guardian ad litem*, LINDA
ESCOBEDO, in each case individually
and as successor in interest to JAMES
JAIMEZ, deceased; and ANDREA
MICHELLE JAIMEZ – CHAVEZ,
individually and as a personal
representative of the Estate of JAMES
JAIMEZ;

Plaintiffs,

vs.

COUNTY OF LOS ANGELES, a public
entity; LOS ANGELES COUNTY
SHERIFF, a public entity; MYKEL
TRUJILLO; MICHAEL ROW; JOSE
ARELLANO; DONNIE JOHNSON;
STEPHON DAVIDSON; ARTURO
BARRERA; CLIFFORD JONES;
MICHAEL CARPENTER; RUTH SHEN;
AND HIE FRAZIER, inclusive,

Defendants.

CASE NO.: 5: 15-cv-01346-VAP-SP

**PROTECTIVE ORDER RE CONTROL
AND USE OF CONFIDENTIAL
WITNESS INFORMATION**

Honorable Magistrate Judge Sheri Pym

1 IT IS HEREBY STIPULATED by and between non-party County of San
2 Bernardino (hereinafter "County") and both the Plaintiffs and Defendants
3 (Hereinafter "Parties") hereto that this Court issue a Protective Order as it
4 concerns various information and discovery materials in the subject case.

5 The subject case involves a claim of civil rights violations as a result
6 of an officer involved shooting.

7 Plaintiffs have sought, by way of written discovery, certain
8 confidential information and records concerning the investigation of the
9 incident by the County. To prevent unwarranted disclosure of confidential
10 information and records, the County and the Parties propose the following
11 protective order concerning confidential personal information for civilian
12 witnesses:

13 1. The documents and information disclosed pursuant to this
14 protective order shall be designated by page numbers 1 to _____. Each
15 document page shall be marked as follows: "Confidential Material."

16 2. The "Confidential Material" (hereafter "material") may be
17 disclosed to counsel and the parties in this action. The material may not
18 be disclosed to any other person without the prior written stipulation of the
19 County or authorization from the Court.

20 3. The material shall be used solely in connection with this litigation
21 in the preparation and trial of this case, and not for any other litigation. To
22 the extent material that is a subject matter of this protective order is
23 disclosed at any deposition in this matter, it is subject to the terms of this
24 protective order. To the extent the parties' counsel seeks to use the
25 material at trial or public hearing in this action, it shall be subject to prior
26 review and further order of this Court.

ORDER

This Protective Order is granted as proposed by the County of San Bernardino and Parties and the materials designated herein shall be subject to all its terms and conditions.

DATED: April 22, 2016



UNITED STATES MAGISTRATE JUDGE
SHERI PYM